# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, ET AL.,

Plaintiffs,

v.

TATE REEVES, in his official capacity as Governor of the State of Mississippi, ET AL.,

Defendants.

Case No. 3:23-cv-272-HTW-LGI

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Plaintiffs respectfully move for leave to file a reply memorandum in support of their Motion for Preliminary Injunction (ECF No. 41) that exceeds by up to 5 pages the cumulative 35-page briefing limit set by Local Civil Rule 7(b)(5), resulting in a total page limit of 40 pages. In support of this Motion, Plaintiffs state that the issues raised in Defendants' 35-page Response in Opposition to Plaintiffs' Motion for Preliminary Injunction re Appointment of Judges (ECF No. 50) are sufficiently complex to require up to 5 additional pages from Plaintiffs in reply.

Plaintiffs have conferred with Defendants, and Counsel for Defendant Randolph takes no position on this Motion. Counsel for the remaining Defendants have no objection to this Motion.

Respectfully submitted this 9th day of June, 2023.

## /s/ Eric H. Holder, Jr.

Eric H. Holder, Jr.,\* DC Bar # 303115 Carol M. Browner,† DC Bar # 90004293 Megan A. Crowley,\* DC Bar # 1049027 Gary S. Guzy,\* DC Bar # 375977 Mark H. Lynch,\* DC Bar # 193110 Brenden J. Cline,\* DC Bar # 1021317

## **COVINGTON & BURLING LLP**

One CityCenter 850 Tenth Street NW Washington, DC 20001 Tel: (202) 662-6000 Fax: (202) 662-6291 eholder@cov.com cbrowner@cov.com mcrowley@cov.com gguzy@cov.com mlynch@cov.com bcline@cov.com

Counsel for NAACP

\*Pro Hac Vice

<sup>†</sup>*Pro Hac Vice* Applications to be Filed

## /s/ Carroll Rhodes

Carroll Rhodes, Esq. MS Bar, # 5314

LAW OFFICES OF CARROLL RHODES

POST OFFICE BOX 588 HAZLEHURST, MS 39083 Telephone: (601) 894-4323

Fax: (601) 894-1464 crhode@bellsouth.net

Janette Louard,<sup>†</sup> OH Bar # 066257 Anthony Ashton,<sup>†</sup> MD Bar # 9712160021 Joe R. Schottenfeld,\* DC Bar # 1735796 NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE

4805 Mt. Hope Drive Baltimore, MD 21215 Tel: (410) 580-5777 Fax: (410) 358-9350 jlouard@naacpnet.org aashton@naacpnet.org jschottenfeld@naacpnet.org

Counsel for All Plaintiffs

\*Pro Hac Vice

# **CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2023, I electronically filed the foregoing Plaintiffs' Unopposed Motion for Leave to Exceed Page Limit with the Clerk of the Court by using the Court's CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Mark H. Lynch
Mark H. Lynch

<sup>&</sup>lt;sup>†</sup>Pro Hac Vice Applications to be Filed